

FILED

JAN 07 2020

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY DEPUTY CLERK

UNITED STATES OF AMERICA,
Plaintiff,

v.

Brandon SIMS,
and
Rose Rodriguez RABIN,
Defendants.

CRIMINAL NO.

A20 CR 011 RP

INDICTMENT

[21 USC 841—distribution meth;
18 USC 922,924 (c)—possession/
use of firearm during drug
trafficking; felon in
possession of firearm]

USAO # 2019R23657

THE GRAND JURY CHARGES:

Count One
[21 U.S.C. § 841(a)(1) and 846]

Beginning in or about November, 2019 and continuing until on or about December 10,
2019, in the Western District of Texas, and elsewhere the Defendants,

Brandon SIMS
and
Rose Rodriguez RABIN,

did knowingly, intentionally and unlawfully combine, conspire confederate and agree with others
known and unknown to possess with intent to distribute a controlled substance, which offense
involved more than 500 grams of a mixture or substance that contained a detectable amount of
methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States
Code, Sections 846, 841(a) and 841(b)(1)(A).

Count Two
[21 U.S.C. § 841(a)(1)]

On or about December 10, 2019, in the Western District of Texas, the Defendants,

Brandon SIMS
and
Rose Rodriguez RABIN,

knowingly, intentionally and unlawfully possessed with intent to distribute a controlled substance, which offense involved more than 500 grams of a mixture or substance that contained a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

Count Three
[18 U.S.C. 922(g)(1)]

On or about December 10, 2019, at Austin, TX, in the Western District of Texas, the
Defendants,

Brandon SIMS,

knowing that he had previously been convicted of a felony offense punishable by imprisonment for a period exceeding one year, did knowingly and unlawfully possess a firearm and ammunition, all of which had moved in commerce and affecting interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1) and 924(a).

Count Four
[18 USC § 924 (c)]

On or about December 10, 2019, at Austin, TX, in the Western District of Texas and elsewhere, the Defendant,

Brandon SIMS
and
Rose Rodriguez RABIN,

during and in relation to a drug trafficking crime charged in counts 1 and 2 herein, did knowingly possess a firearm in furtherance of a drug trafficking crime, and all in violation of Title 18, United States Code, Section 924(c)(1).

A TRUE BILL:
SIGNATURE REDACTED PURSUANT
TO E-GOVERNMENT ACT OF 2002
FOREMAN

John F. Bash
UNITED STATES ATTORNEY

By:


MARK H. MARSHALL
Assistant U.S. Attorney